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Attorneys for Defendant Barclays Bank Delaware

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

William H. Ball,

Plaintiff,

v.

BARCLAYCARD
BARCLAYSUS
A Delaware corporation,
Defendant.

Case No. 2:23-cv-02019-JAD-BNW

**UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR BARCLAYS
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

Pursuant to Fed. R. Civ. P. 6(b) and L.R. IA 6-1, Defendant Barclays Bank Delaware ("Barclays"), by counsel, respectfully requests a thirty (30) day enlargement of the time to respond to the Complaint of Plaintiff William H. Ball in this action ("Plaintiff"). In support thereof, Defendant states:

1. On November 7, 2023, Plaintiff filed his Complaint in the Eighth Judicial District Court in and for Clark County, Nevada.
2. On November 16, 2023, Barclays was served with the Complaint.
3. On December 7, 2023, Barclays timely removed the action to this Court [ECF No. 1].
4. The undersigned was just recently retained in this action, and requires additional time to investigate all relevant matters, ascertain the veracity of the averments in Plaintiff's Complaint, analyze and ascertain any and all affirmative and other defenses, and otherwise submit

1 a proper response to the Complaint. In addition, the requested enlargement of time will permit
 2 Defendant to identify the account and complete its research. For these reasons, Defendant
 3 respectfully requests a thirty (30) day extension of time -- i.e., through and including January 13,
 4 2024 -- within which to respond to Plaintiff's Complaint.

5 5. This motion is made in good faith and not for purposes of undue delay. This is
 6 Defendant's first extension request, and no party will be prejudiced by the relief sought.

7 6. Counsel for Defendant conferred with Plaintiff regarding the extension of time
 8 requested herein, who confirmed that Plaintiff does not oppose the relief sought.

9 WHEREFORE, Defendant Barclays Bank Delaware respectfully requests that the Court
 10 grant this Unopposed Motion and extend the time for Barclays Bank Delaware to respond to the
 11 Complaint by and through January 13, 2024.

12 DATED this 14th day of December, 2023.

13
 14 LEWIS ROCA ROTHGERBER CHRISTIE LLP

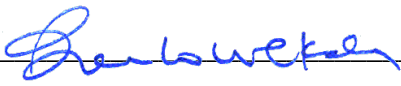
15 By: /s/ Brittini Tanenbaum

16 J. Christopher Jorgensen (SBN: 5382)
 17 Brittini A. Tanenbaum (SBN: 16013)
 18 3993 Howard Hughes Parkway, Suite 600
 19 Las Vegas, NV 89169

20 *Attorneys for Defendant Barclays Bank Delaware*

21 **ORDER**

22
 23 **IT IS SO ORDERED.**

24
 25 
 26 UNITED STATES MAGISTRATE JUDGE
 27 DATED: 12/18/2023
 28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on this 14th day of December, 2023 by depositing said copies in the United States Mail, postage prepaid thereon, and via electronic mail upon the following:

William H. Ball
P.O. Box 90051
Henderson, Nevada 89009
951-923-9498
Billball49@verizon.net
Plaintiff Pro-se

/s/ Sharon L. Kuller
An employee of Lewis Roca Rothgerber Christie